

**FILED**

**JUN 23 2022**

HEATHER E. WILLIAMS, Bar #122664  
Federal Defender  
ERIN SNIDER, Bar #304781  
Assistant Federal Defender  
Office of the Federal Defender  
2300 Tulare Street, Suite 330  
Fresno, California 93721  
Tel: (559) 487-5561  
Fax: (559) 487-5950

CLERK U.S. DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA  
BY \_\_\_\_\_  
DEPUTY CLERK

Attorneys for Defendant  
BRIGIT MARIE BISSELL

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
vs.  
  
BRIGIT MARIE BISSELL,  
  
Defendant.

Case No. 1:22-cr-00031-DAD-BAM-1  
  
STIPULATION TO PERMIT TRAVEL  
TO EASTERN DISTRICT OF  
CALIFORNIA FOR ATTORNEY  
MEETING; ORDER  
  
JUDGE: Hon. Erica P. Grosjean

IT IS HEREBY STIPULATED by and between the parties, through their respective counsel, Assistant United States Attorney Antonio Jose Pataca, counsel for plaintiff, and Assistant Federal Defender Erin Snider, counsel for defendant Brigit Marie Bissell, that this Court should permit Ms. Bissell to travel from the Western District of Washington to the Eastern District of California for the purpose of meeting with her attorney. Pretrial Services Officer Anthony Perez has no objection to this request.

Ms. Bissell is currently subject to a location-monitoring condition pursuant to which she must remain in her residence in the Western District of Washington from 9:00 p.m. to 6:00 a.m. Ms. Bissell has an upcoming motion hearing before the Honorable Dale A. Drozd on June 27, 2022, at 10:00 a.m. Undersigned defense counsel would like to meet with Ms. Bissell in person to prepare for the hearing and discuss the case. Although Ms. Bissell's current travel condition restricts her travel to both the Western District of Washington and the Eastern District of

1 California, Pretrial Services Officer Anthony Perez has advised that, because Ms. Bissell's  
2 location-monitoring device cannot track her movements outside the residence, she would be  
3 unmonitored while in transit and while she is in the Eastern District of California. Accordingly,  
4 Officer Perez advised that Court authorization is required.

5 Ms. Bissell intends to drive from her residence near Seattle to Fresno. The drive is  
6 approximately fourteen hours. She would leave on Saturday, June 25, 2022, so that she could  
7 break up the drive over two days (Saturday and Sunday). Ms. Bissell and undersigned defense  
8 counsel would meet in the morning of June 27, 2022, before the 10:00 a.m. hearing and Ms.  
9 Bissell would appear via Zoom for the 10:00 a.m. hearing from undersigned defense counsel's  
10 office. Ms. Bissell and undersigned defense counsel would meet again following the hearing to  
11 further review her case. Ms. Bissell would leave Fresno the following day, on June 28, 2022, and  
12 return to the Western District of Washington on June 29, 2022, at which time she would be  
13 subject to location monitoring again.

14 In light of the foregoing, the defense requests—with the agreement of both counsel for  
15 the government and Pretrial Services Officer Perez—that this Court authorize Ms. Bissell to  
16 travel, unmonitored, from the Western District of Washington to the Eastern District of  
17 Washington between June 25, 2022, and June 29, 2022.

18  
19 Respectfully submitted,

20 PHILLIP A. TALBERT  
United States Attorney

21 Date: June 23, 2022

/s/ Antonio Jose Pataca  
22 ANTONIO JOSE PATACA  
Assistant United States Attorney  
23 Attorney for Plaintiff

24 HEATHER E. WILLIAMS  
25 Federal Defender

26 Date: June 23, 2022

/s/ Erin Snider  
27 ERIN SNIDER  
Assistant Federal Defender  
28 Attorney for Defendant  
BRIGIT MARIE BISSELL

**ORDER**

**IT IS SO ORDERED.** The Court hereby grants defendant Brigit Marie Bissell permission to travel from the Western District of Washington to the Eastern District of Washington from June 25, 2022, to June 29, 2022.

DATED: June 23, 2022



Hon. Erica P. Grosjean  
United States Magistrate Judge